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12 Attorneys for Defendants
13 SUTTER HEALTH and SUTTER MEDICAL
14 CENTER OF SANTA ROSA

15 UNITED STATES DISTRICT COURT
16 NORTHERN DISTRICT OF CALIFORNIA

17 Defendants JOSEPH N. MATEL, M.D. and
18 RICHARD FLINDERS, M.D. UCHAMP,
19 Individually,

20 Plaintiffs,

21 v.

22 SONOMA COUNTY SHERIFF'S
23 DEPARTMENT, et al.
24 Defendants.

CASE NO.: 3:08-CV-02675-EDL

Hon. Elizabeth D. Laporte

**STIPULATION RE DETERMINATION
OF GOOD FAITH SETTLEMENT;
[Proposed] ORDER**

25 IT IS HEREBY STIPULATED by the parties, by and through their counsel of record,
26 that:

27 1) Defendants JOSEPH N. MATEL, M.D. and RICHARD FLINDERS,
28 M.D. CHAMP have entered into a confidential settlement with the Plaintiffs.

2) Similarly, defendants, SUTTER HEALTH and SUTTER MEDICAL CENTER OF
SANTA ROSA have entered into a separate confidential settlement with Plaintiffs.

3) All parties identified above stipulate to the good faith of the each settlement.

4) All parties agree that the terms of the settlement reached between Defendants

1 JOSEPH N. MATEL, M.D. and RICHARD FLINDERS, M.D. and Plaintiffs and the
2 settlement between Defendants SUTTER HEALTH and SUTTER MEDICAL CENTER OF
3 SANTA ROSA and Plaintiffs will remain confidential, except as required by law.

4 5) If any party should seek to invalidate this good faith settlement, seek
5 indemnification, or otherwise challenge the good faith nature of the settlement, that party
6 shall be liable for the attorneys' fees and costs associated with enforcing the good faith
7 settlement of the above-captioned matter; and

8 6) That this stipulation may be signed in counterparts and via facsimile.

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11 DATED: 5/4, 2012

LA FOLLETTE, JOHNSON,
DE HAAS, FESLER & AMES

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14 By: 

Cameron J. Whitehead, SBN 150680
Attorneys for Defendant,
SUTTER HEALTH and SUTTER
MEDICAL CENTER OF SANTA
ROSA

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18 DATED: 4-25, 2012

HASSARD BONINGTON LLP

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20 By: 

Marc N. Zimmerman, SBN 100521
Attorney for Defendants JOSEPH N.
MATEL, M.D. and RICHARD FLINDERS
FLINDERS, M.D.

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27 **ORDER**

1 GOOD CAUSE APPEARING and pursuant to the stipulation of the parties, the court
2 hereby orders:

3 1) The settlement between Defendants JOSEPH N. MATEL, M.D. and
4 RICHARD FLINDERS, M.D. and defendants SUTTER HEALTH and SUTTER MEDICAL
5 CENTER OF SANTA ROSA is in good faith within the meaning of the Code of Civil
6 Procedure sections 877 and 877.6 and shall have the effect under the law as provided by those
7 sections;

8 2) If any party should seek to invalidate this good faith settlement, seek
9 indemnification, or otherwise challenge the good faith nature of the settlement, that party
10 shall be liable for the attorneys' fees and costs associated with enforcing the good faith
11 settlement of the above-captioned matter.

12 DATED: _____, 2012
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15 _____
16 Judge, United States District Court
17 Northern California
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